

1 Amy F. Sorenson, Esq.  
Nevada Bar No. 12495  
2 Blakeley E. Griffith, Esq.  
Nevada Bar No. 12386  
3 Holly E. Cheong, Esq.  
Nevada Bar No. 11936  
4 SNELL & WILMER L.L.P.  
3883 Howard Hughes Pkwy, #1100  
5 Las Vegas, Nevada 89169  
6 Telephone: 702-784-5200  
Facsimile: 702-784-5252  
7 Email: asorenson@swlaw.com  
bgriffith@swlaw.com  
8 hcheong@swlaw.com

9 *Attorneys for Defendant Bank of America, N.A.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 RICHARD ZEITLIN, ADVANCED  
13 TELEPHONY CONSULTANTS, MRZ  
MANAGEMENT, LLC, DONOR  
14 RELATIONS, LLC, TPFE, INC., AMERICAN  
TECHNOLOGY SERVICES, COMPLIANCE  
15 CONSULTANTS, CHROME BUILDERS  
CONSTRUCTION, INC., and UNIFIED  
16 DATA SERVICES,

17 Plaintiffs,

18 v.

19 BANK OF AMERICA, N.A., and JOHN and  
JANE DOES 1-100,

20 Defendants.  
21

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO PLAINTIFFS' OBJECTION TO  
MAGISTRATE JUDGE'S REPORT AND  
RECOMMENDATION DENYING  
PLAINTIFFS' MOTION TO AMEND  
AND SUPPLEMENT COMPLAINT**

**(SECOND REQUEST)**

22 Pursuant to Local Rules IA 6-1, IB 3-2, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced  
23 Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American  
24 Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified  
25 Data Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and  
26 through their respective undersigned counsel of record, submit this Stipulation and Proposed  
27 Order for a 1-week extension of BANA's deadline to file its response to Plaintiffs' Objection to  
28 Magistrate Judge's Report and Recommendation Denying Plaintiffs' Motion to Amend and

Supplement Complaint (ECF No. 214) (the “Objection”). The Objection was filed on November 18, 2021. No hearing date is set. The Parties request an extension from December 16, 2021, BANA’s current deadline to respond, to December 23, 2021.

This is the Parties’ second request for an extension of the briefing deadlines for the Objection and is not intended to cause any delay or prejudice to any party. The reason for the extension is to give the Parties time to evaluate and respond to the arguments set forth in the Objection.

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time for BANA to file their response to the Objection is extended to and through December 23, 2021.

**IT IS SO STIPULATED.**

Dated: December 13, 2021

THE BERNHOFT LAW FIRM, S.C.

/s/ Robert G. Bernhoft

Robert G. Bernhoft, Esq.

Admitted *Pro Hac Vice*

Wisconsin Bar No. 1032777

Thomas E. Kimble, Esq.

Admitted *Pro Hac Vice*

Illinois Bar No. 6257935

Daniel James Treuden, Esq.

Wisconsin Bar No. 1052766

1402 E. Cesar Chavez Street

Austin, Texas 78702

Joel F. Hansen, Esq.

Nevada Bar No. 1876

Hansen & Hansen, LLC

9030 W. Cheyenne Avenue, #210

Las Vegas, Nevada 89129

*Attorneys for Plaintiffs*

Dated: December 13, 2021

SNELL & WILMER L.L.P.

/s/ Holly E. Cheong

Amy F. Sorenson, Esq.

Nevada Bar No. 12495

Blakeley E. Griffith, Esq.

Nevada Bar No. 12386

Holly E. Cheong, Esq.

Nevada Bar No. 11936

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

*Attorneys for Defendant Bank of America,  
N.A.*

**IT IS SO ORDERED.**



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED: December 14, 2021